

Lee's Summit, MO 64064

2012 JUL -2 PM 1:1

June 25, 2012

OFFICE OF GENERAL  
COUNSEL

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Attention: General Counsel's Office


Re: MUR 6592

We received your letter on June 23, 2012.

Pursuant to the allegations brought forth by Mr. Stephen R. Bough, we are making the following response: (See page 4, attached here to)

- A. Only one week of time, Thanksgiving week 2010 was donated to the Turk campaign. The value of this "Time Share" week is between \$1000.00 and \$1200.00.
- B. This "Time Share" week was purchased by Dennis Fastnacht in January, 1987. No other names appear on the purchase agreement.
- C. The allegation brought forth by Mr. Bough that this "Time Share" week was corporate owned is not based on any fact.

Sincerely,

  
Dennis D. Fastnacht

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of behavior of violating federal election law is demonstrated by the following violations outlined below.

**Violation, failed to properly disclaim campaign materials having the "Paid For By" disclaimer included in a box.** These same campaign materials are being used for the 2012 election cycle. (Exhibits H,I,J,K,L,M,N & O)

**Violation, campaign materials represented Mr. Turk as being a current Member of Congress** by failing to have the words indicating he is a candidate i.e. "for" "vote" "elect" etc. the materials read "Turk U.S. Congress." These same campaign materials are being used for the 2012 election cycle. (Exhibits H,I,J,K,L,M,N & O)

**Violation, failed to disclose TV advertising purchases timely.** The TV buys reflect purchases occurring prior to the Pre-Election Report for 2010, but no expenditure was reported. The dates are clear, as are the payments' timing to the vendors. A like violation occurred in the 3<sup>rd</sup> quarter of 2010 when the largest campaign expenditure of \$19,794.00 on August 3, 2010 was not reported timely, but subsequently reported after the fact. (Exhibits P)

**Violation, accepted corporate contributions.** The FEC has previously asked for clarification of "in-kind" donations received by "Turk for Congress." A number of the items received as "in-kind" are highly suspect. For instance a Garmin GPS was received as "in-kind" donation from Jan Sindt, an employee of Garmin. The question is whether this is simply a pass-through conduit of the corporate donation from Garmin Industries to "Turk for Congress." Further, vacation rentals were received by "Turk for Congress" from multiple entities; one specifically comes from a home builder Dennis & Joni Fastnacht - Dennison Development, documentation needs to be secured reflecting private ownership of this vacation rental versus corporate ownership of this vacation rental. Additionally, Lone Summit Ranch hosted a "Turk for Congress" fundraising auction where Lone Summit Catering owner Judy Gibson provided in-kind catering services, as did her husband John Gibson. However, Missouri State Corporate records show 100% ownership of Lone Summit Catering is directly attributed to Judy Gibson with John Gibson having no ownership stake according to corporate filings with